

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
v.	)	CRIMINAL NO. 15-cr-10145-RGS
	)	
VANDELL WOODS,	)	
Defendant.	)	

**MOTION TO BE RETURNED TO NEW YORK STATE CUSTODY**  
**(assented to)**

Defendant, Vandell Woods, hereby moves this Honorable Court to order his return to the state of New York, where he is serving a prison sentence.

As reasons therefore, the Defendant states that he does not intend to insist on a trial within four months. The Defendant requests additional time to review the voluminous discovery in the case, investigate possible motions, and develop a defense.

The Defendant therefore requests he be returned to the physical custody of the New York State Department of Corrections to serve the remainder of his prison sentence. The Defendant, having consulted with counsel, understands that making this request constitutes a waiver of speedy trial rights under the Interstate Agreement on Detainers (although not under the Constitution or other provisions of law). The Defendant understands that his presence may be required in this court from time to time in connection with the case, and consents to be returned to New York State custody after any such appearance in this District by means of a Federal Writ of Habeas Corpus Ad Prosequendum.

The Defendant requests the Court hold a hearing on this motion.

Respectfully submitted,  
VANDELL WOODS,  
By his attorney,

/s/ Ian Gold  
Ian Gold (BBO# 665948)  
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Date: February 24, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that true copies of this document will be served on the registered parties through the ECF system on this date, Feb. 24, 2015.

/s/Ian Gold  
Ian Gold